



Meredith A. Firetog

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October 25, 2023

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007

Re: Doe v. Black, Case No. 1:23-cv-06418-JGLC

Dear Judge Clarke:

We represent Plaintiff Jane Doe (“Plaintiff”) in the above-captioned matter. We write in furtherance to Plaintiff’s opposition to Defendant’s Motion for Sanctions (Motion, Dkt. No. 49, Opposition, Dkt. No. 59). Yesterday, in the case of *Cheri Pierson v. Leon Black et al.*, 952002/2022 (N.Y. Supreme Court, New York County) (“*Pierson*”), the Honorable Suzanne J. Adams issued a Decision and Order denying Defendant Leon Black’s (“Black”) motion for sanctions against Wigdor LLP (“Wigdor”). In *Pierson*, like here, Black filed a motion for sanctions against Wigdor only, not Ms. Pierson, on the basis that Wigdor was engaged in a purported “pattern” to “ruin Black’s reputation,” supposedly evidenced by Wigdor’s refusal to believe Black’s protests that he never sexually assaulted Ms. Pierson. See Dkt. No. 61, Ex. 6 (*Pierson* sanctions motion). As with his arguments in this action, in *Pierson*, Black’s request for sanctions was based on his claim that Wigdor “failed to investigate” its client’s allegations prefiling. The court noted that “[i]n light of the fact that there has been discovery in this action to date, there is no basis in the record for the court to conclude that any or all allegations or claims . . . are demonstrably false as a matter of law.” This authority further supports this Court’s denial of Black’s Motion here.¹ A copy of the Decision and Order is attached hereto.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Firetog".

Meredith A. Firetog

Cc: All counsel of record (*via* ECF)

¹ Pursuant to 22 N.Y.C.R.R. 130.1.1, Wigdor asked the court in *Pierson* to order that Black reimburse the firm for its fees and costs to respond to his frivolous motion, which the court denied.